Environmental Resources Management

CityCentre Four
840 W. Sam Houston Pkwy N.
Suite 600
Houston, Texas 77024
(281) 600-1000
(281) 600-1001 (Fax)

October 17, 2016

Mr. Michael Malone
CPS Energy
145 Navarro, Mail Drop 100406
San Antonio, Texas 78296

Project No. 0352436

Subject: Structural Stability and Safety Factor Assessments
Calaveras Power Station
San Antonio, Texas

Dear Mr. Malone:

Environmental Resources Management Southwest, Inc. (ERM) is pleased to provide this review of structural stability and safety factor assessments performed at the Calaveras Power Station, to assist CPS Energy in complying with Title 40, Code of Federal Regulations, Part 257 (40 CFR §257), Subpart D Coal Combustion Residual (CCR) Rules.

The Calaveras Power Station has five CCR surface impoundments: the North and South Sludge Recycle Holding (SRH) Ponds, the North and South Bottom Ash Ponds (BAPs), and the Evaporation Pond (EP). All ponds were constructed as diked impoundments. The SRH Ponds were constructed as a single impoundment with a divider wall that separates the impoundment into the North and South Ponds. A gate present in the divider wall is closed during normal operating procedures, but can be opened. The North and South BAPs share a common embankment that separates the ponds, and are immediately east of the SRH Pond. Only one BAP is typically in operation at one time. These four ponds are located east of the main Plant site. The EP is approximately a mile north of the main plant, and receives boiler chemical cleaning wastes. While this material is not considered CCR under the regulation, the EP was originally constructed as a fly ash landfill in 1990, and then converted to a fly ash impoundment in 1996. It currently contains solids that are six inches to two feet below the top of the impoundment.

40 CFR §257.73(d) requires that facilities conduct initial and periodic structural stability assessments for CCR surface impoundments to document whether the design, construction, operation, and maintenance of the CCR unit is consistent with recognized and generally accepted good engineering practices for the maximum volume of CCR and CCR wastewater which can be impounded therein. Table 1 provides a summary of the requirements within the regulation, and the relevant information for each surface impoundment.

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Factors of safety were calculated by Raba Kistner Consultants, Inc. (RKCI) in May 2014. These assessments were provided in a report entitled "*Geotechnical Engineering Study for Ash Pond Berms – Spruce/Deely Generation Units, San Antonio, Texas.*" ERM reviewed the information in these reports to evaluate whether factors of safety met the limits set forth in 40 CFR §257.73(e). All but one embankment evaluated by RKCI met the safety factor limits. The single non-complying safety factor was for the exterior slope of the northwestern berm on the North BAP, identified as cross-section or Embankment G. The steady-state safety factor for Embankment G was calculated at 1.2, and 1.4 on a reanalysis using a deeper failure surface. The minimum required safety factor for steady-state conditions is 1.5.

The RKCI report indicated that slopes used in the calculation for Embankment G were based on design drawings and field observations, not actual surveys. CPS Energy therefore engaged the services of a land surveyor (Pape-Dawson Engineers, Inc.) to collect measurements in two locations along Embankment G. The results of this survey, and the original RKCI soil data, were provided to HTS, Inc. Consultants (HTS), a geotechnical consulting firm in Houston, Texas. HTS recalculated the steady-state factor of safety utilizing the actual survey data. The calculated safety factors for both slopes were greater than 4. The letter report from HTS is included in Attachment 1.

Based on our evaluation of the available information for the impoundments, the structural stability and safety factor assessments meet the requirements of 40 CFR §257.73(d) and (e).

Sincerely,

Environmental Resources Management

Chris Cunningham, P.E.

STATE OF TEXAS
CHRIS CUNNINGHAM
94591
LICENSED
PROFESSIONAL ENGINEER
10/17/16

Table 1
Attachment 1

TABLE 1
Summary of Impoundment Requirements

Regulatory Citation	Requirement	Sludge Recycle Holding Ponds	Bottom Ash Ponds	Evaporation Pond
(d)(1)(i)	Stable foundations and abutments	Based on calculated factors of safety, foundations and abutments are stable.	Based on calculated factors of safety, foundations and abutments are stable.	Based on calculated factors of safety, foundations and abutments are stable.
(d)(1)(ii)	Adequate slope protection to protect against surface erosion, wave action, and adverse effects of sudden drawdown	Slopes are vegetated with a continuous, maintained grass cover and inspected regularly for evidence of erosion.	Slopes are vegetated with a continuous, maintained grass cover and inspected regularly for evidence of erosion.	Slopes are vegetated with a continuous, maintained grass cover and inspected regularly for evidence of erosion.
(d)(1)(iii)	Dikes mechanically compacted to a density sufficient to withstand the range of loading conditions in the CCR unit	Based on geotechnical analysis and current slope conditions, it is likely that the dikes were mechanically compacted to a density sufficient to withstand the range of loading conditions in the CCR unit. Construction records documenting this are not available.	Based on geotechnical analysis and current slope conditions, it is likely that the dikes were mechanically compacted to a density sufficient to withstand the range of loading conditions in the CCR unit. Construction records documenting this are not available.	Based on geotechnical analysis and current slope conditions, it is likely that the dikes were mechanically compacted to a density sufficient to withstand the range of loading conditions in the CCR unit. Construction records documenting this are not available.
(d)(1)(iv)	Vegetated slopes of dikes and surrounding areas not to exceed a height of six inches above the slope of the dike	Grass on slopes is regularly mowed to maintain height below six inches.	Grass on slopes is regularly mowed to maintain height below six inches.	Grass on slopes is regularly mowed to maintain height below six inches.
(d)(1)(v)(A)	All spillways must be either: (1) Of non-erodible construction and designed to carry sustained flows; or (2) Earth- or grass-lined and designed to carry short-term, infrequent flows at nonerosive velocities where sustained flows are not expected.	Overflow spillways are concrete-lined. Regular discharge is via pumps through steel piping.	Ponds discharge via steel piping for regular and overflow discharges.	Not applicable. There are no outfalls for the pond.
(d)(1)(v)(B)	Spillways must adequately manage flow during and following the peak discharge from the required design storm flow.	Inflow during a storm is limited to direct precipitation. Sufficient headboard is maintained to capture design storm flow without requiring discharge.	Inflow during a storm is limited to direct precipitation. Sufficient headboard is maintained to capture design storm flow without requiring discharge.	Inflow during a storm is limited to direct precipitation. Sufficient headboard is maintained to capture design storm flow without requiring discharge.
(d)(1)(vi)	Hydraulic structures underlying the base of the CCR unit or passing through the dike of the CCR unit must maintain structural integrity	Not applicable. There are no hydraulic structures underlying the pond.	Steel pipes acting as outfalls are regularly inspected to verify no erosion or damage.	Not applicable. There are no hydraulic structures underlying the pond.
(d)(1)(vii)	Maintain structural stability during low pool of the adjacent water body or sudden drawdown of the adjacent water body.	Toe of embankments are at or above pool elevation of Calaveras Lake, which is maintained artificially. Therefore, no rapid drawdown or low pool conditions are likely.	Toe of embankments are at or above pool elevation of Calaveras Lake, which is maintained artificially. Therefore, no rapid drawdown or low pool conditions are likely.	Toe of embankments are at or above pool elevation of Calaveras Lake, which is maintained artificially. Therefore, no rapid drawdown or low pool conditions are likely.

HTS, Inc. Consultants
416 Pickering Street, Houston, TX 77091
www.htshouston.com

Phone 713-692-8373
Fax 713-692-8502
Toll Free 1-800-692-TEST

Excellence in Engineering, Consulting, Testing and Inspection

July 20, 2016

ERM, Inc.
840 W. Sam Houston Parkway N.
Suite 600
Houston, Texas 77024

Attn: Mr. Chris Cunningham P.E.

Re: Letter Report
Steady State Slope Stability Analysis
Ash Pond Berms - Spruce/Deely Generation Units
San Antonio, Texas

HTS Project No.: 16-S-303

Dear Mr. Cunningham:

This letter provides results of the slope stability analyses performed on the 2 sections provided by ERM, Inc. The original geotechnical investigation (report dated May 7, 2014) was performed by Raba Kistner Consultants (RKC). HTS was requested to perform steady state slope stability analyses on 2 sections that were modified due to low factors of safety (below 1.5) against a slope stability failure.

Slope stability analyses were performed using the soil parameters provided on page 11 of RKC report and the subsoil profile defined by Geotechnical Boring No. 7 which is located near section G as presented in RKC report, Figures A-1 and C-1b. The 2 section configurations used in our slope stability analyses are presented in Appendix A.

Slope stability analyses were performed in order to determine the factors of safety of the side slopes of the section configurations against a slope stability failure. The long term (steady state) shear strengths of the cohesive soils are based on the shear strength parameters from consolidated undrained triaxial tests performed and presented on the table on page 11 of RKC report. The cohesion and angle of friction for sands were assumed to be zero and 28°, respectively, for a conservative approach. The water gradient was also considered to be close to the ground surface for a conservative analysis. The results of these analyses are shown below and in Appendix B.

SECTION	FACTOR OF SAFETY (LONG TERM CONDITION)
Section Along CSA	4.06
Section Along CSB	4.08

The results of the stability analyses using the shear strength parameters as discussed above suggest that the slopes of the section configurations provided by ERM will be stable in the long term condition.

Should you have any questions or require additional information pertaining to this letter, please do not hesitate to contact us at your convenience.

Sincerely,
HTS, Inc. Consultants

STATE OF TEXAS
BONIFACIO F. MUSNGI, JR.
90666
LICENSED
PROFESSIONAL ENGINEER

07/20/16

Bonifacio F. Musngi Jr., P.E.
Senior Engineer

HTS, Inc. Consultants
F-3478

Attachments: Appendix A – Slope Section Configurations
Appendix B – Slope Stability Analyses Results

BFM/ba/cg

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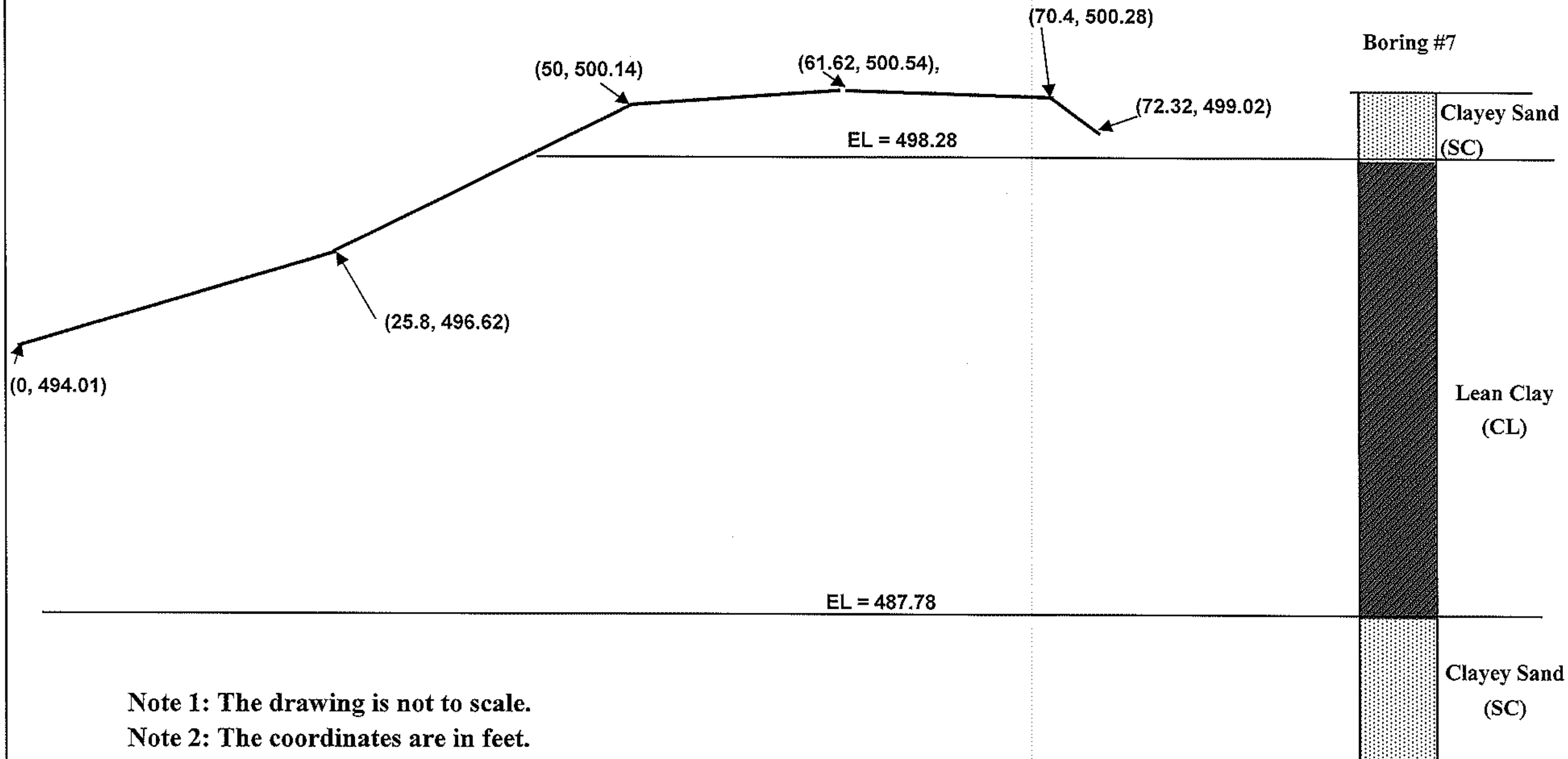
APPENDIX A

SECTION ALONG CSA

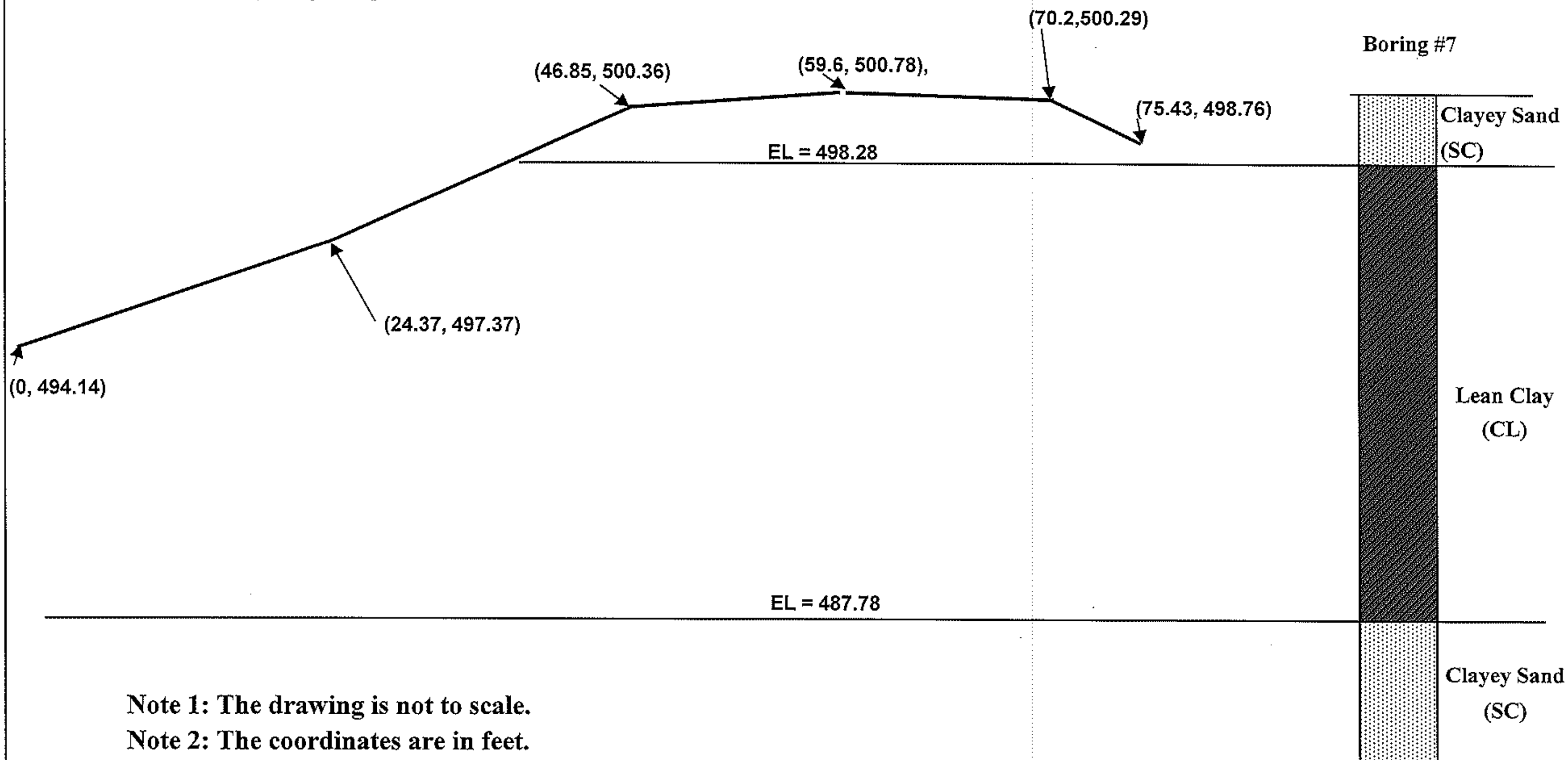


Note 1: The drawing is not to scale.
Note 2: The coordinates are in feet.

HTS, INC. Consultants

Typical Section Configuration for Slope Stability Analyses - Section Along CSA		
Steady State Slope Stability Analysis Ash Pond Berms - Spruce/Deely Generation Units San Antonio, Texas		
Date: 7/18/16	HTS Proj No.: 16-S-303	Plate 1

SECTION ALONG CSB



Note 1: The drawing is not to scale.
Note 2: The coordinates are in feet.

HTS, INC. Consultants

Typical Section Configuration for Slope Stability Analyses - Section Along CSB		
Steady State Slope Stability Analysis Ash Pond Berms - Spruce/Deely Generation Units San Antonio, Texas		
Date: 7/18/16	HTS Proj No.: 16-S-303	Plate 2

APPENDIX B

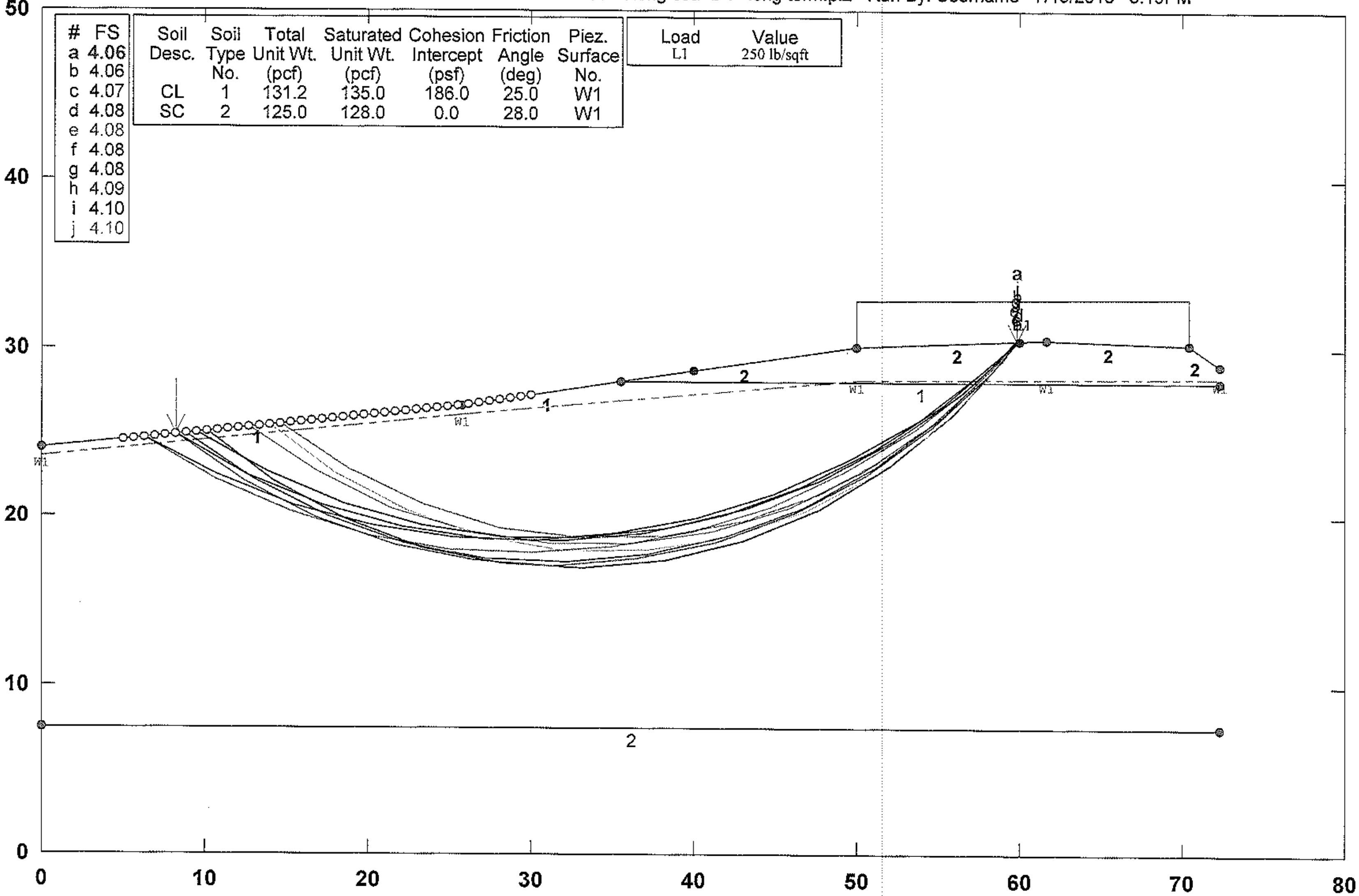
Ash Pond Berms - Spruce/Deely, B-7 Long Term, CSA

h:\stedwinfiles\16-303- erm-san antonio\erm- section along csa- b-7- long term.pl2 Run By: Username 7/19/2016 3:19PM

#	FS
a	4.06
b	4.06
c	4.07
d	4.08
e	4.08
f	4.08
g	4.08
h	4.09
i	4.10
j	4.10

Soil Desc.	Soil Type No.	Total Unit Wt. (pcf)	Saturated Unit Wt. (pcf)	Cohesion Intercept (psf)	Friction Angle (deg)	Piez. Surface No.
CL	1	131.2	135.0	186.0	25.0	W1
SC	2	125.0	128.0	0.0	28.0	W1

Load	Value
L1	250 lb/sqft



STABL6H FSmin=4.06

Safety Factors Are Calculated By The Modified Bishop Method

HTS, INC. Consultants

Ash Pond Berms - Spruce/Deely, B-7 Long Term, CSB

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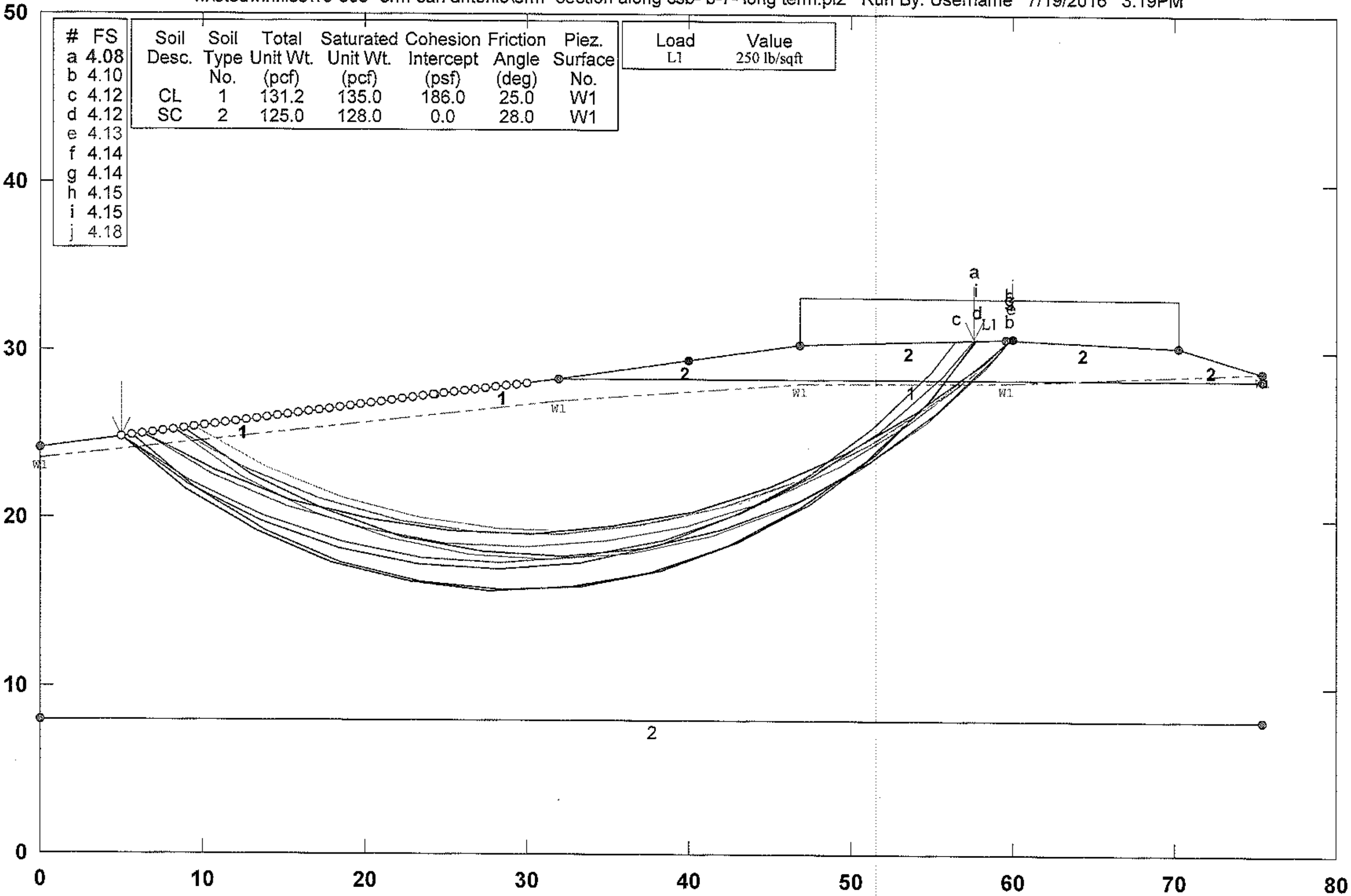

STABL6H FSmin=4.08

Safety Factors Are Calculated By The Modified Bishop Method

HTS, INC. Consultants